

# RAWLE & HENDERSON



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December 14, 2007

Via Facsimile and ECF  
Paul A. Crotty, USDJ  
United States District Court  
Southern Dist. Of New York  
500 Pearl Street, Ctn 20-C  
New York, NY

Re: Donna Castillo vs. Bisson Moving and Storage Co., et al  
Civil Action No: 07cv5705 (PAC)  
Our File No. 801788

December 14, 2007  
**Application GRANTED**  
**SO Ordered**

*Paul A. Crotty*  
USDJ

*h & expert  
discovery (i.e.  
medical testimony) is to  
be included within the 60  
day extension, as demanded at the  
conference on 12/17/2007*

Dear Judge Crotty:

With the consent of our adversary, we respectfully request a 60 day extension of the fact discovery end date of 1/11/08 and the expert discovery deadline of 2/26/08 due to difficulty coordinating depositions and physical examinations prior to the deadlines.

The deposition of plaintiff was completed on December 12, 2007. Defendant, Andrew Parker, who resides out-of-state, was not available on December 12, 2007. We are in the process of coordinating mutually agreeable dates for his deposition. In addition, we will not be able to obtain dates for examinations of plaintiff by our experts until late January and early February due to the availability of our experts.

Should the Court require a telephone conference to further discuss this matter, please notify our office and we will arrange one at the Court's convenience. Thank you for your anticipated attention and consideration to this matter.

Very truly yours,

RAWLE & HENDERSON LLP

By: *Jeffrey A. Segal*  
Jeffrey A. Segal

JAS/CAC

cc: Heath Buzin, Esquire

MEMO ENDORSED

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